

### REMARKS/ARGUMENTS

Claims 1, 16, 17, 22, 31, 32 and 34 are amended. Claims 15 and 30 are canceled. New claims 38-41 are submitted with this response. Claims 1-14, 16-29 and 31-41 remain in the application.

Applicant hereby requests further examination and reconsideration of the application in view of the foregoing amendments and discussion below.

Claims 1, 22, and 34 are amended so as to incorporate the elements of canceled claims 15 and 30. Specifically, claims 1, 22 and 34 are amended to recite that the sheet is altered upon removal from a surface to which the sheet is releasably adhered.

Claims 38-41 are added depending directly and indirectly from claim 22, and are consistent with original claims 18-21.

The claims of the application are rejected by the examiner as being anticipated by, or obvious in view of, Dobashi (Japanese Publication #: 2002-318405) in view of the admitted and submitted prior art. The examiner states that Dobashi teaches an apparatus for securing a mobile terminal including a housing and an imaging device; the securing apparatus comprising a sheet having an upper surface and a lower surface; and an adhesive applied on the lower surface of the sheet, wherein the sheet may be releasably adhered to the surface of the mobile terminal for covering a lens to substantially prevent image capture by the imaging device. The examiner further contends that Dobashi teaches a mobile terminal for use in a wireless communication system, comprising: a housing; an imaging device disposed within the housing; a sheet having an upper surface and a lower surface; and an adhesive applied on the lower surface of the sheet, wherein the sheet may be releasably adhered to the surface of the mobile terminal for covering a lens to substantially prevent image capture by the imaging device. With respect to claim 34, the examiner states that claim 34 is a method claim corresponding to the apparatus claim 1; therefore, claim 34 is analyzed and rejected as previously discussed with respect to claim 1. The examiner takes Official Notice that camera phones are well known and expected in the art, and one of ordinary skill would look to apply the method of Dobashi to camera phones for the advantages stated in Dobashi.

The Applicant respectfully submits that independent claims 1, 22 and 34 patentably distinguish from Dobashi. Claims 1, 22 and 34, as amended, recite, *inter alia*, a sheet having an adhesive applied on a surface of the sheet, wherein the sheet may be releasably adhered to a mobile terminal for covering a lens to substantially prevent image capture. Importantly, the sheet is altered upon removal from the mobile terminal. This feature, with the advantages described in the specification, is neither taught nor suggested by Kobashi.

Kobashi teaches a re-usable camera lens cover. The Kobashi lens cover incorporates a long lasting adhesive, and is intended as a replacement for a traditional plastic snap-on lens cover or a mechanized lens cover that is built into the camera. Kobashi fails to disclose a lens cover that is altered upon removal. Moreover, this is contrary to Kobashi, which necessarily teaches a

conventional lens cover that is used over and over again, as one would expect with a snap-on or mechanical lens cover.

In the present application, the securing apparatus for a mobile terminal, as now claimed, contributes significantly to the goal of preventing unwanted image capture by a user of the mobile terminal. The adhesive sheet effectively prevents image capture, and the claimed feature of alteration upon removal allows easy detection of a surreptitious attempt to remove the sheet for taking the picture, because replacing the sheet cannot hide the alteration to the sheet. Further, dependent claims 16-21 and 31, 32 and 38-41 define "alteration" of the sheet in several claimed forms, including loss of adhesiveness or irreversible destruction of the sheet. Kobashi fails to recognize and thus realize the advantages which the Applicant has achieved in his invention by the claimed one-time use of the sheet in conjunction with a mobile terminal. If that feature were indeed obvious, it would have been disclosed in at least one of the references relied upon by the Examiner.

Given the advantages of the claimed invention explained above and in the specification, and the fact that no references show such a design, Applicant respectfully submits it is not obvious to provide an adhesive sheet for preventing image capture by a mobile terminal in the claimed manner. Therefore, Applicant believes claims 1, 22 and 34 define a novel invention which is not fairly suggested by Kobashi, either alone or in any reasonable combination with other prior art.

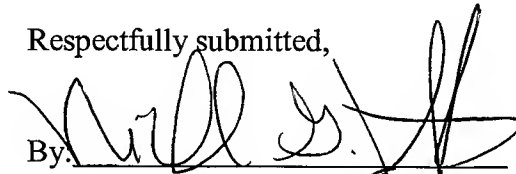
The remaining claims of the present application all depend from claims 1, 22 and 34. In addition to the distinguishing features recited in the cited independent claims and discussed above, the securing apparatus of the present invention has additional advantageous features defined in the claims depending from claims 1, 22 and 34, which further distinguish the present invention over the prior art. Kobashi does not disclose or suggest these features with the many advantages.

For the foregoing reasons, the Applicant respectfully submits that the presently claimed invention is not anticipated nor fairly taught or suggested by Kobashi, either alone or in any reasonable combination suggested by the prior art. Reconsideration and withdrawal of the rejections and allowance of claims 1-14, 16-29 and 31-41 at an early date are respectfully requested.

If the Examiner has any questions about the present Amendment or anticipates finally rejecting any claim of the present application, a telephone interview is requested.

Date: 8-25-08

Respectfully submitted,

By: 

Michael G. Johnston  
Registration No.: 38,194  
Moore & Van Allen PLLC  
430 Davis Drive, Suite 500  
P.O. Box 13706  
Research Triangle Park, NC 27709  
Phone: 919-286-8000  
Facsimile: 919-286-8199